REMARKS

Claim 1 has been revised to further clarify the features of the invention. Support for the revisions to claim 1 can be found throughout the specification, and at least on page 20 and in Section 11 (pages 91-92) of the specification as filed, and in Figure 10-14. Claim 2 has been revised to be consistent with the revisions to claim 1.

Claim 17 has been canceled without prejudice for re-presentation in a continuing application in the interest of advancing prosecution and without acquiescence to the rejections of record.

No new matter has been introduced, and entry of the above revised claims is respectfully requested.

Alleged rejections under 35 U.S.C. §102(e)

Claims 1, 2 and 15 are rejected under 35 U.S.C. §102(e) as allegedly anticipated by Goodman (U.S. Patent Application No. 2003/0023420). Applicant has reviewed the statement of rejection and respectfully traverses because no *prima facie* case of anticipation exists as applied to the claims as revised.

Claim 1 has been clarified to reflect that the full code, which corresponds to a set of characters, is made up of keyed values that are unique to each character. Thus, as seen in Figure 10-14, the full code for "beijing" is 1**#44#773, where unique codes are assigned to each letter as follows: b = 1; e = **; i = #; j = 44; n = 77; and g = 3. In the context of the invention, the simple code for "beijing," in which only one button is pressed for each letter regardless of how many characters are assigned to the button, is 1*#4#73.

The disclosure of Goodman is clearly limited to the latter "simple code", or "single-tap" approach, in which a user presses a numeric key, which is associated with more than one letter, only once. *See* Goodman at paragraphs [0005] and [0025]. For example, Goodman teaches that using the numeric keypad in Figure 1, the word "call" corresponds to the numbers 2255 using this method. *See* Goodman at paragraph [0029]. More than one letter may be associated with the same numeric key, which introduces considerable ambiguity in associating the keyed input with the desired characters or words. Thus 2255 could also correspond to "ball" using the "single-tap" approach. *Id.* Goodman attempts to resolve this ambiguity with disclosed logic in

that document using a context-based approach. *Id.*

Claim 1 as revised attempts to clarify the nature of the full code according to the claimed invention. A full code, as show in Figure 10-14 of the application as file, assigns unique button combinations to each character. Thus, using a Repeat Selection Method, which can be a form of the Full Input Method, as applied to the keypad in Figure 1 of Goodman, "call" would correspond to 2222555555, with c = 222, a = 2, and l = 555. On the other hand, "ball" would correspond to 222555555, with b = 22.

According to claim 1, and by way of a non-limiting example, if 222555555 is entered using the buttons on the keypad, then these input values would be compared to full code values in an index. The index has previously associated "222555555" with "ball." When a match is found between the input values and the full code in the index, then "ball" is recognized as the target characters.

Because Goodman seeks to address ambiguities from the entry of values using a single tap approach, however, it does not disclose or suggest the use of full codes together with an index that associates full codes with characters. Figure 2 of Goodman is limited to a situation where the ambiguity from a single-tap approach is resolved using a "machine learning approach." This is not the case in the present claimed subject matter. For these reasons, Applicant respectfully submits that the Goodman document does not anticipate claims 1, 2 and 15.

Claims 16-17 are rejected under 35 U.S.C. §102(e) as allegedly anticipated by Bradford (U.S. Patent Application No. 2002/0196163). Applicant has reviewed the statement of rejection and respectfully traverses because no *prima facie* case of anticipation exists as applied to the claims as revised.

As an initial matter, Applicant notes that based on his understanding of the Office Action, this Response addresses an anticipation rejection against claims 16-18 based on the above-referenced Bradford document. Applicant notes that the statement of rejection on page 3 of the Office Action only reflects a rejection against claims 16 and 17, and that pages 3-4 of the Office Action repeatedly refer to the Goodman document. If Applicant is mistaken with respect to his understanding, Applicant requests clarification in the next Office Communication and reserves the right to respond to this rejection based on any misunderstanding.

The Bradford document does not disclose or suggest the combination of a short stroke followed by a long stroke of a key as featured in claim 16, nor does it disclose or suggest the combination of an input of an alphabet character followed by a long stroke of a control button. The disclosure of Bradford is limited to "long pressing" followed by various options. Bradford does not disclose or suggest "long pressing" after pressing the same or another key to explicitly enter a character. Because the Bradford document does not include every limitation of claims 16 and 18, Applicant respectfully submits that no *prima facie* case of anticipation exists.

For all of the above reasons, Applicant respectfully requests reconsideration and withdrawal of these anticipation rejections.

Conclusion

It is believed that the application is now in condition for allowance. Applicant requests the Examiner to issue a notice of Allowance in due course. The Examiner is encouraged to contact the undersigned to further the prosecution of the present invention.

The Commissioner is authorized to charge JHK Law's Deposit Account No. **502486** for any fees required under 37 CFR §§ 1.16 and 1.17 and to credit any overpayment to said Deposit Account No. **502486**.

                                             Respectfully submitted,

                                             JHK Law

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